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July 7, 2014

Hon. Lewis Kaplan
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

[VIA FAX: 212-805-7910]

Re: United States v. Anas al Liby, S10 98-cr-1023

Your Honor,

Counsel for the above-named Defendant currently has three motions outstanding:

1. Motion pursuant to Rule 16
2. Motion pursuant to Rule 15
3. Motion seeking Defendant's severance from the scheduled trials of co-defendants Bary and Fawwaz.

The Motions with regard to Rules 15 and 16 were duly filed with the Court on June 16th, 2014. See Docket Entry Nos. 1634, 1635. The Government served their Response on July 2d, 2014. Thus, under L.Crim.R. 49.1(c), Defendant's Reply, if any, is due on or before July 9th, 2014.

The Motion for Severance, was filed with this Court on June 19th, 2014. The Government similarly filed a Letter Response on July 2d, 2014. Thus, under L.Crim.R. 49.1(c), Defendant's Reply, if any, is due on or before July 9th, 2014.

In order to fully respond Counsel herein is scheduled to visit with his client on July 9th, 2014 – the due date for the above Replies – and confer on those details that can be discussed with the Defendant under the existing Rules and Protective Order. Counsel is further scheduled to be in Court all day on July 10th on an unrelated matter.

As visits with the Defendant necessitate travel to North Carolina, and a two-day period out of my office, I would respectfully request that Defendant be granted until Monday, July 14th, 2014 to file his Replies on all of the above-referenced Motions.

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Counsel has contacted Assistant U.S. Attorney Nicholas Lewin, who has stated that they have no objection to this extension of time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bernard", with a long horizontal flourish extending to the right.

Bernard V. Kleinman

CC: All Counsel of Record by ECF